

New York State Department of Environmental Conservation

Division of Environmental Remediation

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January 23, 2014

Ms. Lora Fly
Naval Facilities Engineering Command, Mid-Atlantic
Building Z-144
9742 Maryland Avenue
Norfolk, VA 23511-3095

Mr. Edward Hannon
Northrop Grumman Corporation
925 S. Oyster Bay Rd.
M/S W1635
Bethpage, New York 11714-3582

Re: Northrop-Grumman Bethpage Facility (130003A and
NWIRP-Bethpage (130003B) OU2 Remedy

Dear Ms. Fly and Mr. Hannon:

This is to follow up on the New York State Department of Environmental Conservation's (DEC's) request for a commitment from the Navy and Grumman to perform additional work in the southern portion of the western lobe of the Operable Unit No. 2 groundwater plume. While the DEC is aware of the work that the Navy is already doing, it was useful to hear it all presented together and in context of the overall OU2 program. The DEC agrees that the work being undertaken or planned will better delineate the area of elevated groundwater contamination and should identify if an additional area(s) elevated groundwater contamination exists in this location. The use of the term "hot spot" in my July 11, 2013 letter did not refer to the usage of the term as used in the OU2 Record of Decision, it was intended to identify a discrete area of significantly elevated concentrations within the off-site migrating plume. We anticipate that further remedial action may be required even if an identified area is less than 1 ppm. However, my request for a commitment for investigation, followed by an evaluation and remedial action, if determined to be necessary, remains the DEC position. The determination of what may be required will be made after the delineation is complete and the Navy and Northrop Grumman present their evaluation for review.

During the September 16, 2013 conference call, the Navy indicated they were going to submit work plans for an additional seven borings associated with the outpost monitoring wells in November 2013. The Navy submitted a work plan for five borings in the GM 75 Area on November 21st, and submitted an "Abbreviated Work Plan" for six additional vertical profile borings on December 10, 2013 to better define the contamination south of the former

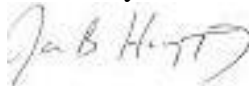
Navy/Grumman complex. While we continue to acknowledge the work that the Navy is doing and can agree that this work is related to, and necessary for an investigation of the southern portion of the western lobe, it is not the comprehensive work plan that was requested. Such a comprehensive work plan will identify all of the work that is required, describe how it will be evaluated in terms of identifying another possible area of elevated concentration, and include a schedule as to when the activities will be completed. Please indicate when this overall work plan will be submitted.

Also, during the September 2013 conference call, Northrop Grumman and/or the Navy stated you were jointly working with the Water District(s) on a number of topics, including pumping the wells on a 24/365 basis. Please provide the status of those discussions. Lastly, Northrop Grumman and the Navy stated that you were scheduled to meet the week following the conference call to discuss the overall strategy to address this issue (as outlined in the November, 2012 meeting held with EPA). Please provide the status of those discussions and a schedule as to when the strategy may be submitted to DEC.

Lastly, during the meeting, Kim Brown indicated that the Navy is committed to whatever is needed, and that the Navy's actions demonstrated a commitment to do so. While we agree that the actions indicate a commitment to perform additional investigation, we are unclear of the Navy's commitment to undertake remedial actions to address this part of the plume should there be a determination that such actions are necessary. Northrop Grumman has expressed support for the concept and appears to be working with Navy but they have never expressed a commitment. I request that both Northrop Grumman and the Navy provide a formal commitment to complete the investigation and implement remedial actions, if determined necessary.

Please contact me if there are questions.

Sincerely



James B. Harrington, P.E.
Director
Remedial Bureau A

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